

Jeremy (& Diane) Stansfield
Jeremy Stansfield & Associates, Inc

July 5, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

My wife and I are extremely concerned that the FTC's proposed Business Opportunity Rule R511993 will negatively affect and diminish our very sizeable independent USANA Health Sciences business — which has taken a considerable amount of time, energy, and focus to build. We understand and appreciate the FTC's responsibility to protect the public from "unfair and deceptive acts or practices," but we believe the rule goes too far in trying to protect the public by proposing certain unnecessary and burdensome requirements that will make it very difficult if not impossible for us to sell USANA products.

We strongly feel the proposed seven-day waiting period is absolutely unnecessary and will create more negative for our industry than positives. We are not selling hand guns! People buy legitimate products and services every day that have no such waiting period. Imagine what would happen to any industry such as foods, electronics, clothing, etc. if customers were required to wait seven days. At USANA, we offer 100% money back no questions asked during their first 30 days like most merchandisers do. Although, we take it a strong step further by allowing our customers / associates to make get a 90% refund on any unopened products for up to a year. The seven day waiting rule will force many consumers to buy from local retailers rather than through us with direct sales. Not to mention how difficult this rule would be to follow with keeping accurate records of paperwork back to the company on a rule like this. We truly don't see how the rule could be 100% enforced and we believe it will create many people being dishonest of what was the real date they were introduced.

The proposed rule for complete disclosure of any lawsuits gives us a very unfair advantage in the marketplace. There are so many sue happy people in this country and can begin lawsuits with nearly zero evidence. If a company is found innocent, why would they be required to disclose this? A potential USANA associate will automatically feel that something is wrong and not get involved if they see this kind of disclosure.

Diane and I are also very concerned about the proposed rule requiring disclosing to each prospective independent USANA Associate the names and contacting information of 10 independent USANA Associates who live nearest to them. Our sales organizations works in genealogy referral lines meaning this would create chaos in terms of losing prospects to different associates rather than the one that introduced them to USANA. If they get the contact information of close representatives, they may likely enroll with them. Even though they have a stronger

relationship and should have loyalty to the one who introduced them first, this is bound to create deceptive practices. This will open up a whole new can of worms so-to-speak. Not only internal deceptive practices, but industry cross raiding will become uncontrollable due to independent representatives of many companies misleading other competitor representatives just to gain access to contacts in another company that they can now go after! Additionally, in today's world, identity theft is at the top of many minds when asked to give out contact info. It's going to make this new proposed rule very difficult to follow through with to get people that will want to join USANA knowing that their contact info will now be given out. We are glad to provide references when asked, but a mandate to follow this rule will create a devastating effect.

Diane and I have been building a USANA business for ten years on a full time basis. Our USANA commission checks and bonus checks are our only income stream to support our family and has been for the entire the year journey. We have seen this business positively impact the lives of thousands of people in so many ways! The personal growth and development is amazing. The focus on family and health and reaching out to make a difference in the world is something that is too difficult to express in only words. This is truly a life changing opportunity for those that build big like us or those that build small. We are so proud to sell USANA products as our customers absolutely love the products! Most customers cannot go a day without them because they know how important they are to maintaining their health and using health meal alternatives. Very seldom do we have a customer or associate that decides to return products, and when this happens they are taken care of immediately with the convenient return policies that USANA offer.

In conclusion, we believe that the work of the FTC is extremely valuable to protect consumers and keep industries legitimate. Without the FTC, none of us would have the opportunity to bring products to a marketplace that could create strong growth and long term financial rewards. Although, we feel that the proposed rules outlined above will actually hurt our industry in a major way and destroy the livelihood of families across the US that have worked so hard to make a living in our industry. We are confident that there are far better alternatives that would be utilized to minimize and nearly eliminate the unethical companies and opportunities and salespeople in our industry. Please address alternatives that punish those abusing others but does not stifle or hurt those that are building legitimately with high quality companies, products, and methods.

Thank you for listening.

Sincerely,

Jeremy Stansfield
Diane Stansfield

(Signatures available upon request via fax or mail)